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Attorneys for Plaintiffs
RON MOWDY and JOAQUAN HARVEY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RON MOWDY, JOAQUAN HARVEY,
individually named and on behalf of all
others similarly situated,

Plaintiffs,

vs.

BENETO BULK TRANSPORT, KENAN
ADVANTAGE GROUP, INC.,

Defendants.

Case No. C06-05682 MHP

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO EXTEND THE PARTIES'
DEADLINE TO FILE THEIR JOINT CASE
MANAGEMENT STATEMENT, JOINT
DISCOVERY REPORT AND TO SERVE
INITIAL DISCLOSURES**

CLASS ACTION

Complaint Filed: September 15, 1006

1 Plaintiffs Ron Mowdy and Joaquan Harvey ("Plaintiffs") and Defendants Beneto Bulk
2 Transport and Kenan Advantage Group, Inc. ("Defendants") (collectively, the "Parties"), by and
3 through their respective counsel of record, file this Stipulation and Proposed Order to Extend
4 Defendants' Deadline to File A Responsive Pleading and to Continue Certain Preliminary
5 Litigation Deadlines:

6 WHEREAS, the Initial Case Management Conference is currently scheduled for March 5,
7 2007;

8 WHEREAS, the Parties continue to address and discuss a number of case issues and
9 intend to resolve them prior to filing their Joint Case Management Conference Statement, Joint
10 Discovery Report and serving their Initial Disclosures;

11 WHEREAS, the Parties have met and conferred and agreed to mutually extend the
12 deadline to file their Joint Case Management Conference Statement, Joint Discovery Report and
13 to serve their Initial Disclosures;

14 WHEREAS, neither party will be prejudiced as a result of extending this mutual deadline
15 by two court days;

16 WHEREAS; the parties' stipulation to extend their deadline to file their Joint Case
17 Management Conference Statement, Joint Discovery Report and to serve their Initial Disclosures
18 does not alter any other date of any event or any deadline already fixed by Court order, except for
19 the dates that correspond with the Initial Case Management Conference;

20 GOOD CAUSE exists to extend the Parties' deadline to file their Joint Case Management
21 Conference Statement, Joint Discovery Report and to serve their Initial Disclosures until March 1,
22 2007,

23 IT IS HEREBY STIPULATED between Plaintiffs and Defendants that the Parties'
24 deadline to file their Joint Case Management Conference Statement, Joint Discovery Report and
25 to serve their Initial Disclosures be continued to March 1, 2007.

1 Dated: February __, 2007

LAWSON LAW OFFICES

2 By: _____

3 Antonio M. Lawson

4 Attorneys for Plaintiffs

RON MOWDY and JOAQUAN HARVEY

5 Dated: February 23, 2007

MORGAN, LEWIS & BOCKIUS LLP

6 By: Brian L. Johasrud

7 Brian L. Johasrud

8 Attorneys for Defendants

BENETO BULK TRANSPORT and

9 KENAN ADVANTAGE GROUP, INC.

10 **ORDER**

11 IT IS ORDERED that that the Parties' deadline to file their Joint Case Management
12 Conference Statement, Joint Discovery Report and to serve their Initial Disclosures be continued
13 to March 1, 2007.

14
15 2/27/2007




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1 Dated: February 22, 2007

LAWSON LAW OFFICES

2 By: 
 3 Antonio M. Lawson
 4 Attorneys for Plaintiffs
 RON MOWDY and JOAQUAN HARVEY

5 Dated: February __, 2007

MORGAN, LEWIS & BOCKIUS LLP

6 By: _____
 7 Brian L. Johnsrud
 8 Attorneys for Defendants
 9 BENETO BULK TRANSPORT and
 KENAN ADVANTAGE GROUP, INC.

10 **ORDER**

11 IT IS ORDERED that that the Parties' deadline to file their Joint Case Management
 12 Conference Statement, Joint Discovery Report and to serve their Initial Disclosures be continued
 13 to March 1, 2007.

14 _____
 15 Honorable Marilyn H. Patel
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28 MORGAN, LEWIS &
 BOCKIUS LLP
 ATTORNEYS AT LAW
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Case No. C06-05682 MHP

STIPULATION AND [PROPOSED] ORDER TO EXTEND THE PARTIES' DEADLINE TO FILE THE JOINT
 CMC STATEMENT, JOINT DISCOVERY REPORT AND TO SERVE INITIAL DISCLOSURES